

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
VICTORIA DIVISION

GLORIA FRIC,

Plaintiff,

v.

ALLSTATE LIFE INSURANCE
COMPANY,

Defendant.

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Civil Case No. 6:21-CV-42

PROPOSED TOPICS AND QUESTIONS
FOR EXAMINATION OF PROSPECTIVE JURORS

Defendant Allstate Life Insurance Company ("Allstate") hereby submits its proposed topics and questions for examination of prospective jurors.

1. This case is about a life insurance policy. Gloria Fric is a beneficiary of an Allstate life insurance policy issued to her former husband David Fric. David Fric passed away on October 18, 2020. Other than what you have heard in Court today, do any of you know anything about the facts of this case through any personal knowledge?

2. Other than what you have heard in Court today, do any of you know anything about this case or has anyone heard or read anything about this case?

3. Do you understand that the jury-selection process is the sole opportunity that Ms. Fric and Allstate will have to learn if you have had prior experiences or have feelings or knowledge that may influence how you view the evidence in this case?

4. I am going to read a list of individuals. Please raise your hand if you or any member of your immediate family (including your spouse, children, step-children,

parents, brothers, sisters, brothers-in-law, sisters-in-law, or parents-in-law) knows or has had any dealings with any of these individuals:

- a. Gloria Fric
- b. David Fric
- c. Troy Fric
- d. Joe Fric
- e. Roland Grote
- f. Janet Dever

5. I am going to read a list of business entities. Please raise your hand if you or any member of your immediate family (including your spouse, children, step-children, parents, brothers, sisters, brothers-in-law, sisters-in-law, or parents-in-law) has ever worked for or had any business dealings with any of these businesses, including if you or an immediate family member has had any insurance issued by any of these entities or has held stock in any of the entities:

- a. Allstate Life Insurance Company
- b. Allstate Insurance Company
- c. Everlake Services Company
- d. Everlake Life Insurance Company

6. Please raise your hand if you, anyone close to you, or any member of your family (including your spouse, children, step-children, parents, brothers, sisters, brothers-in-law, sisters-in-law, or parents-in-law) have ever been represented by, had any business dealing with, or been employed by, any of these attorneys or their law firms:

- a. Jim Cole, Sam Cole, and Will Sciba of Cole, Cole, Easley & Sciba, P.C.
in Victoria, Texas for Ms. Fric
- b. Don Littlefield and Susan Logsdon of Bressler, Amery & Ross, P.C.
in Houston, Texas for Allstate
- c. David Donahue and Louis Mendez of Bressler, Amery & Ross, P.C.
in Birmingham, Alabama for Allstate.

- 7. Please raise your hand if you know anyone on the jury panel.
- 8. Please raise your hand if you or anyone in your immediate family is a lawyer or has ever studied law.
- 9. Please raise your hand if you have ever been a witness at a trial, civil or criminal.
- 10. Please raise your hand if you have ever served as a juror in a civil or criminal trial or served as a grand juror, in either state or federal court.
- 11. Please raise your hand if you have ever been a plaintiff or defendant in a lawsuit, whether filed in state or federal court, arbitration, or any other dispute resolution forum.
- 12. Please raise your hand if you or anyone in your immediate family has ever been employed by an insurance company?
- 13. Please raise your hand if you or anyone in your immediate family has ever had any experience with insurance companies or insurance agents that might impact your ability to be a fair and impartial juror.

14. Please raise your hand if you currently have or have ever had any type of insurance policy with Allstate.

15. Please raise your hand if you have seen any newspaper or magazine articles or seen anything on television, besides commercials, about Allstate.

16. If the evidence supports a finding in favor of Allstate, is there anyone here who is not willing to find for Allstate just because it is an insurance company?

17. Is there anyone here who would ignore the law, and render a verdict that did not apply the law, because you disagreed with the law?

18. Are you a member of any organization that pertains to the justice system or reform or modification of the justice system?

19. This case is expected to last 2-3 days. Do you have any confirmed vacation plans or other family matters that would conflict with your serving as a juror in this case?

20. Do you have any physical disability or condition that would interfere with you serving as a juror in this case?

21. Do you have any philosophical, religious, or other beliefs that would make it difficult for you to serve as a juror and sit in judgment of the actions of others?

22. Have you heard anything during this jury-selection process that causes you concern about your ability to be a fair and impartial juror in this case?

23. Is there anyone here who, based on what you have heard of this case so far, has already made a decision about this case?

24. Is there any matter that you would like to discuss privately that bears on your ability to serve as a juror in this case?

Dated: September 29, 2022

Respectfully Submitted,

s/ Louis F. Mendez

David P. Donahue (admitted *pro hac vice*)

Louis F. Mendez (admitted *pro hac vice*)

BRESSLER, AMERY & ROSS, P.C.

2001 Park Place, Suite 1500

Birmingham, AL 35203

Telephone: (205) 719 0400

Email: ddonahue@bressler.com

lmendez@bressler.com

and

Donald R. Littlefield, Esq.

Texas Bar No. 12427350

Susan A. Logsdon, Esq.

Texas Bar No. 00999300

BRESSLER, AMERY & ROSS, P.C.

3700 Buffalo Speedway, Suite 1020

Houston, TX 77098

Tel.: 713-403-6400

Email: dlittlefield@bressler.com

slogsdon@bressler.com

Attorneys for Defendant

Allstate Life Insurance Company

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing served on the following via the Court's CM/ECF system on September 29, 2022:

Jim Cole, Esq.

COLE, COLE, EASLEY & SCIBA, P.C.

302 West Forrest Street

Victoria, TX 77901

jcole@colefirmservice.com

Attorneys for Plaintiff

s/ Louis F. Mendez

Louis F. Mendez